

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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DINOSAUR FINANCIAL GROUP, LLC,	:	
HILDENE CAPITAL MANAGEMENT,	:	
LLC, and SWISS LIFE INVESTMENT	:	
MANAGEMENT HOLDING AG on behalf	:	
of themselves and all others similarly	:	
situated,	:	
	:	
Plaintiffs,	:	
	:	Case No. 1:22-cv-1860-KPF
-against-	:	
	:	
S&P GLOBAL, INC., AMERICAN	:	
BANKERS ASSOCIATION, and FACTSET	:	
RESEARCH SYSTEMS INC.,	:	
	:	
Defendants.	:	
	:	
	X	

STIPULATION AND [PROPOSED] ORDER REGARDING S&P GLOBAL, INC. DATA

WHEREAS, on April 9, 2025, plaintiffs sent a letter to S&P Global, Inc. (“S&P”) with questions concerning data previously produced by S&P in documents with control numbers SPGI-0000040688, SPGI-0000040689, SPGI-0000040690, SPGI-0000040691, SPGI-0000040692, SPGI-0000040693, SPGI-0000040694, SPGI-0000041129, SPGI-0000041130, and SPGI-0000002228 (the “Data”).

WHEREAS, there is currently scheduled for April 18, 2025, a deposition of S&P under Rule 30(b)(6), among the topics for which are S&P’s revenues, costs, and financial records.

WHEREAS, S&P represents, after a good faith review, that current employees of S&P do not have substantive knowledge regarding the following documents beyond what is stated in the documents: (i) a 2009 consent to assignment of an August 1, 1989 agreement between The Canadian Depository for Securities Ltd. And Standard & Poor’s Corporation (FRSI00544440); (ii) communications in October 2021 between the Society for Worldwide Interbank Financial

Telecommunications (“SWIFT”) and CUSIP Global Services (“CGS”) (FRSI00064101); (iii) communications in November 2021 among CGS employees about SWIFT (FRSI00064101); (iv) the SWIFT October 2021 CUSIP Use of Service Statement (FRSI00064109); (v) survey results from a 2020 survey presented in a power point to the June 23, 2020 CGS Board of Trustees meeting (FRSI00200179); and (vi) the CGS Board of Trustees meetings on November 14, 2017 (ABA-0000016252), February 27, 2018 (FRSI01657126), June 27, 2018 (ABA-0000016244), October 30, 2018 (ABA-0000016259), and February 26, 2019 (ABA-0000010603).

IT IS THEREFORE STIPULATED AND AGREED AMONG THE PARTIES:

1. S&P will use its best efforts to respond fully in writing to the questions in plaintiffs’ April 9 letter by May 7, 2025.
2. To the extent there is necessary follow-up to S&P’s responses that cannot be responded to in writing pursuant to paragraph 1 or otherwise clarified and explained, S&P will sit for a deposition (and educate someone if need be) limited to no more than two hours on the topics related to the Data.
3. In consideration of the above, the deposition of S&P under Rule 30(b)(6), scheduled for April 18, 2025, is canceled.

SO STIPULATED:

Dated: April 18, 2025.

/s/ Ronald J. Aranoff

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Financial Group, LLC, Hildene Capital
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Investment Management Holding AG, on
behalf of themselves and all others
similarly situated*

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*Attorneys for Defendant S&P Global,
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SO ORDERED.

Dated: _____
New York, New York

Katherine Polk Failla
United States District Judge